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8 Attorneys for Defendant, ALEXANDER SMIRNOV

9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 UNITED STATES OF AMERICA,)
12 Plaintiff,)
13) CASE NO. 2:24-MJ-00166-DJA
14 v.)
15 ALEXANDER SMIRNOV,)
16 Defendant,)
17)

18 **DEFENDANT'S EMERGENCY MOTION FOR COURT ORDER DIRECTING THE**
19 **UNITED STATES MARSHAL SERVICE TO KEEP THE DEFENDANT IN THIS**
20 **DISTRICT PENDING DISPOSITION OF DEFENDANT'S EMERGENCY MOTION**
21 **FOR IMMEDIATE DETENTION HEARING AND RELEASE ON PREVIOUSLY**
IMPOSED CONDITIONS

22 COMES NOW, Defendant, ALEXANDER SMIRNOV (“Mr. Smirnov”), by and through
23 his attorneys, DAVID Z. CHESNOFF, ESQ., and RICHARD A. SCHONFELD, ESQ., of the
24 law firm of CHESNOFF & SCHONFELD and hereby moves this Honorable Court for an Order
25 Directing the United States Marshal Service to Keep the Defendant in this District Pending
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1 Disposition of Defendant's Emergency Motion for Immediate Detention Hearing and Release on
2 Previously Imposed Conditions.

3 Dated this 22nd day of February, 2024.
4

5 Respectfully Submitted:
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7 CHESNOFF & SCHONFELD
8

9 /s/ Richard A. Schonfeld
10 DAVID Z. CHESNOFF, ESQ.

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19 Attorneys for Defendant ALEXANDER SMIRNOV
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2 **MEMORANDUM OF POINTS AND AUTHORITIES**
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4 On February 22, 2024, Defendant filed his Emergency Motion for Immediate Detention
5 Hearing and Release on Previously Imposed Conditions. In that Motion the Defendant requested
6 that the Court enter an interim order directing the United States Marshal Service to keep Mr.
7 Smirnov in this District pending his Rule 5 hearing. *See*, Motion page 5 number 16.

8 On February 22, 2024, this Honorable Court entered a Minute Order directing the
9 Government to respond to the Motion by February 23, 2024 at 4:30 P.M. PST. The Minute
10 Order does not address the request that Mr. Smirnov remain in this District and there is a
11 reasonable concern that the United States Marshal Service may transport the Defendant to the
12 Central District of California prior to this Honorable Court ruling on the Emergency Motion. No
13 hearing has been set on the review of Mr. Smirnov's release status in the Central District of
14 California.

15 Accordingly, it is respectfully requested that the Honorable Court enter an Order
16 directing the United States Marshal Service to keep Mr. Smirnov in this District pending
17 disposition of the Emergency Motion.

18 DATED this 22nd day of February, 2024.

19 Respectfully Submitted:

20 CHESNOFF & SCHONFELD

21 _____
22 /s/ Richard A. Schonfeld
23 DAVID Z. CHESNOFF, ESQ.
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25 520 South Fourth Street
26 Las Vegas, Nevada 89101
27 Telephone: (702)384-5563
28 Attorneys for Defendant

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this 22nd day of February, 2024, I caused the forgoing document
3 to be filed electronically with the Clerk of the Court through the CM/ECF system for filing; and
4 served on counsel of record via the Court's CM/ECF system.
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7 _____/s/ Rosemary Reyes
8 Employee of Chesnoff & Schonfeld
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